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**IN THE UNITED STATES DISTRICT COURT**

**DISTRICT OF NEW HAMPSHIRE**

USMAN CHAUDHRY,

Plaintiff,

v.

TOWNSHIP OF SALEM,  
MICHAEL ZAINO

Defendant.

CASE NO. **25CV125-JL**

**COMPLAINT**

**DEMAND FOR JURY TRIAL**

**BACKGROUND SUMMARY – STATEMENT OF FACT**

1. THIS COMPLAINT, stems from a brutal attack on Plaintiff, CHAUDHRY stemming from 2022 while Plaintiff, CHAUDHRY was on business in New Hampshire.
2. According to cell phone records, Plaintiff Usman Chaudhry immediately called 9-1-1 for police and medical assistance.
3. Salem Police department responded to the call.
4. Instead of providing any assistance, Salem Police Department and Salem EMS attempted to stage this brutal attack as a self-inflicted suicide attempt.
5. , Salem Police Department officers, Christopher Markey, James Carlin, Michael McCarthy, Nick Turner, Sean Marino, Tomas Ken, attempted to stage this brutal attack as a “self-inflicted suicide attempt while in handcuffs”
6. This was done by filing nearly 100 false statements in police reports, tampering with witnesses, fabricating and destroying records.
7. Responding Salem Police Department Officers were injecting and using cocaine while responding to this call.
8. When confronted about the illicit cocaine and drug use, Salem Police officers admitted to cocaine use **ON VIDEO**.
9. Nearly 100 **criminal complaints** have been filed against the Salem Officers for falsifying police reports to cover up an attempted homicide and felony drug use.  
**MICHAEL ZAINO IS COVERING UP THESE CRIMINAL COMPLAINTS.**
10. Nearly all of statements made by officers in Official Statements and Reports are contradicted by video and pictures.

11. This was **AN ATTEMPTED HOMICIDE BY SALEM OFFCIERS WHILE ADMITING TO COCAINE USE ON VIDEO** AND FILING NEARLY 100 FALSE REPORTS WHICH ARE CONTRADICTED BY **VIDEO AND PICTURES**.
12. Defendant, Michael Zaino refuses to take any action against any law enforcement **officer and is actively covering up an ATTEMPTED HOMICIDE, FELONY DRUG USE, and nearly 100 counts of FALSE POLICE REPORTS** due to a perceived personal belief that law enforcement and he, himself, is ABOVE THE LAW and that the law does not apply to him. This is the formal definition of public corruption.
13. **Michael Zaino, Jason Grosky, Tim Prather, and Stacie Moser** have been aggressively attempting to cover this up.
14. Defendant, Michael Zaino has further personally reached out and made numerous illicit threats of retaliation if the video or records and facts proving and showing the criminal activities are posted or disseminated online.

Respectfully submitted this 25<sup>th</sup> day of May, 2025.  
s/ USMAN CHAUDHRY

Usman Chaudhry  
1992 Morris Ave Suite 235  
Union, NJ 07083

Office of the Clerk of Court  
United States District Court for the District of New Hampshire  
Warren B. Rudman United States Courthouse  
55 Pleasant Street - Room 110  
Concord, New Hampshire 03301-3941

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